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TRANSMITTAL FORM

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Total Number of Pages in This Submission		Attorney Docket Number	250/271; OI7011232001
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ENCLOSURES (check all that apply)

<input type="checkbox"/> Fee Transmittal Form	<input type="checkbox"/> Drawing(s)	<input type="checkbox"/> After Allowance Communication to TC
<input type="checkbox"/> Fee Attached	<input type="checkbox"/> Licensing-related Papers	<input type="checkbox"/> Appeal Communication to Board of Appeals and Interferences
<input type="checkbox"/> Amendment / Reply	<input type="checkbox"/> Petition	<input type="checkbox"/> Appeal Communication to TC (Appeal Notice, Brief, Reply Brief)
<input type="checkbox"/> After Final	<input type="checkbox"/> Petition to Convert to a Provisional Application	<input type="checkbox"/> Proprietary Information
<input type="checkbox"/> Affidavits/declaration(s)	<input type="checkbox"/> Power of Attorney, Revocation Change of Correspondence Address	<input type="checkbox"/> Status Letter
<input type="checkbox"/> Extension of Time Request	<input type="checkbox"/> Terminal Disclaimer	<input checked="" type="checkbox"/> Other Enclosure(s) (please identify below):
<input type="checkbox"/> Express Abandonment Request	<input type="checkbox"/> Request for Refund	Issue Fee Transmittal PTOL-85; Comments on Statement of Reasons for Allowance and Request for Initialed IDS'; Copies of IDS' previously submitted on 10/29/03 and 4/9/04; Return Postcard
<input type="checkbox"/> Information Disclosure Statement	<input type="checkbox"/> CD, Number of CD(s) _____	
<input type="checkbox"/> Certified Copy of Priority Document(s)	<input type="checkbox"/> Landscape Table on CD	
<input type="checkbox"/> Reply to Missing Parts/ Incomplete Application		
<input type="checkbox"/> Reply to Missing Parts under 37 CFR1.52 or 1.53		
Remarks		

SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

Firm	Bingham McCutchen LLP		
Signature			
Printed Name	Gerald Chan		
Date	7/22/05	Reg. No.	51,541

CERTIFICATE OF TRANSMISSION/MAILING

I hereby certify that this correspondence is being facsimile transmitted to the USPTO or deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Issue Fee, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the date shown below.

Signature			
Typed or printed name	Linda Major	Date	7/22/05

This collection of information is required by 37 CFR 1.5. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11 and 1.14. This collection is estimated to 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of:)
Henry Schellhorn) Group Art Unit: 3624
Serial No.: 09/614,427) Examiner: Narayanswamy Subramanian
Filed: July 12, 2000) Confirmation No.: 2097
For: VARIANCE REDUCTION)
TECHNIQUE FOR LARGE SCALE RISK)
MANAGEMENT)
)

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE AND
REQUEST FOR INITIALED INFORMATION DISCLOSURE STATEMENTS

Mail Stop Issue Fee
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

The Applicant wishes to thank the Examiner for allowing the above-identified application.

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

The Applicant notes that the Notice of Allowability identifies the claimed invention by reciting the elements of claim 1. The Applicant wishes to clarify that other independent claims, such as claims 8, 17, and 26 each includes their own element(s) and/or combination of elements and therefore, these claims and their respective dependent claims are allowable for what they recite.

REQUEST FOR INITIALED IDS DOCUMENTS

The Applicant submitted Information Disclosure Statements on October 29, 2003 and April 9, 2004. However, the Applicant has not yet received an initialed copy of the PTO/SB/08b

forms submitted on those dates. Attached hereto are copies of both of the Information Disclosure Statements, forms PTO/SB/08b, and the stamped return postcards indicating receipt by the USPTO on October 31, 2003 and April 12, 2004, respectively. The Applicant hereby respectfully requests that the references listed on forms PTO/SB/08b attached to the Information Disclosure Statements filed on October 29, 2003 and April 9, 2004 be initialed to confirm consideration by the Examiner.

If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

Respectfully submitted,

Bingham McCutchen LLP

Dated: 7/22/05

By: Gerald Chan

Gerald Chan

Reg. No. 51,541

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